

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

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In re : Chapter 9  
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CITY OF DETROIT, MICHIGAN, : Case No. 13-53846  
:  
Debtor. : Hon. Steven W. Rhodes  
:  
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**STIPULATION BY AND BETWEEN THE  
CITY OF DETROIT AND THE STATE OF MICHIGAN  
REGARDING DEADLINE FOR FILING PROOF(S) OF CLAIM**

The City of Detroit (the "City") and the State of Michigan (the "State"), by and through each of their undersigned counsel, stipulate as follows:

1. On July 18, 2013, the City filed a petition for relief under chapter 9 of title 11 of the United States Code (the "Bankruptcy Code"). On December 5, 2013, the United States Bankruptcy Court for the Eastern District of Michigan (the "Court") issued an opinion finding that the City is eligible for relief under chapter 9 of the Bankruptcy Code (Docket No. 1945) and entered an order for relief in favor of the City (Docket No. 1946) (the "Order for Relief").

2. On November 21, 2013, the Court entered the Order, Pursuant to Sections 105, 501 and 503 of the Bankruptcy Code and Bankruptcy Rules 2002

and 3003(c), Establishing Bar Dates for Filing Proofs of Claim and Approving Form and Manner of Notice Thereof (Docket No. 1782) (the "Bar Date Order").

The Bar Date Order established: (a) February 21, 2014 at 4:00 p.m., Eastern Time, as the general bar date for the filing of proofs of claim in the City's chapter 9 case; and (b) the first business day that is at least 180 days following the date of the entry of an Order for Relief, i.e., June 3, 2014, at 4:00 p.m., Eastern Time (the "Governmental Unit Bar Date"), as the deadline for the filing of proofs of claim by governmental units (as such term is defined in section 101(27) of the Bankruptcy Code).

3. The City and the State agree that, unless a later deadline applies under the Bar Date Order, all proofs of claim of whatever nature filed by the State shall be deemed timely filed so long as they are filed by the Governmental Unit Bar Date.

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4. The City and the State have agreed to the attached proposed Order and request that the Court enter the same.

Dated: February 20, 2014

/s/ Steven G. Howell

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ATTORNEYS FOR THE CITY

**EXHIBIT 1**

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

In re

: Chapter 9

CITY OF DETROIT, MICHIGAN,

: Case No. 13-53846

Debtor.

: Hon. Steven W. Rhodes

X

**ORDER APPROVING STIPULATION BY AND BETWEEN  
THE CITY OF DETROIT AND THE STATE OF MICHIGAN  
REGARDING DEADLINE FOR FILING PROOF(S) OF CLAIM**

This matter came before the Court on the Stipulation by and Between the City of Detroit and the State of Michigan Regarding Deadline for Filing Proof(s) of Claim (the "Stipulation"),<sup>1</sup> filed by the City of Detroit and the State of Michigan (the "State"); the Court having reviewed the Stipulation; the Court finding that (a) the Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and (b) this is a core proceeding pursuant to 28 U.S.C. § 157(b); and the Court otherwise being fully advised in the premises;

IT IS HEREBY ORDERED THAT:

1. The Stipulation is APPROVED.

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<sup>1</sup>

Capitalized terms not otherwise defined herein have the meanings given to them in the Stipulation.

2. Unless a later deadline applies under the Bar Date Order, all proofs of claim of whatever nature filed by the State shall be deemed timely filed so long as they are filed by the Governmental Unit Bar Date.

**CERTIFICATE OF SERVICE**

I, Heather Lennox, hereby certify that the foregoing Stipulation by and Between the City of Detroit and the State of Michigan Regarding Deadline for Filing Proof(s) of Claim was filed and served via the Court's electronic case filing and noticing system on this 20th day of February, 2014.

/s/ Heather Lennox